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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

**Courtney Cloud,**

Plaintiff,

vs.

**Allstate Indemnity Company;** Does 1  
through 10, inclusive, and Roe  
Corporations 1 through 10, inclusive,  
  
Defendants.

Case No.: 2:23-cv-00468-JCM-DJA

**Stipulation and ~~Proposed~~ Order to  
Extend Deadlines  
(3<sup>rd</sup> Request)**

**IT IS HEREBY STIPULATED AND AGREED** by and between the parties hereto,  
by and through their respective counsel of record, that the discovery deadlines in  
this case be extended as follows:

**A. COMPLETED DISCOVERY**

1. Plaintiff has served her initial disclosures of witnesses and documents, and supplements thereto;
2. Defendant Allstate Indemnity Company has served their initial disclosures of witnesses and documents, and supplements thereto;
3. Plaintiff has propounded and answered written discovery requests;



4. Defendant Allstate Indemnity Company has propounded and answered written discovery requests;
5. Plaintiff has taken the deposition of Allstate Employee Sean Owens;
6. Plaintiff has taken the deposition of Allstate Employee Christine Fox;
7. Plaintiff has taken the deposition of Allstate Employee Jonathan Bourne;
8. Plaintiff has taken the deposition of Allstate Employee Rodney Farney;
9. Defendant has taken the deposition of Plaintiff Courtney Cloud;
10. Plaintiff has noticed the deposition of Allstate Employee Steven Peterson;
11. Defendant has noticed the deposition of Plaintiff's Expert, Steven Strzelec;
12. Plaintiff and Defendant have disclosed their initial expert witnesses and supplements thereto;
13. Defendant has taken the deposition of Plaintiff's Expert Paul Thomas.

#### **B. OUTSTANDING DISCOVERY**

1. Deposition of the Allstate Indemnity Company's FRCP 30(b)(6) witness;
2. Depositions of expert witnesses;
3. Depositions of fact witnesses;
4. Disclosure of rebuttal expert witnesses;
5. Additional written discovery;
6. Disclosure of additional documents.

#### **C. GOOD CAUSE EXISTS FOR AN EXTENSION**

Counsel for the parties have been diligent in conducting discovery but need additional time to depose witnesses and conduct additional discovery. The deposition of Allstate Employee Steven Peterson was scheduled to take place on April 9, 2024, but had to be rescheduled due to unforeseen circumstances arising out of the tragic shooting at the office of Prince Law Group on April 8, 2024. Counsel for Allstate, Mr. Keating, had to leave the office suddenly on April 8, 2024, which was



the date of the deposition preparation appointment for Steven Peterson, as his brother-in-law worked at Prince Law Group. The deposition is now set to take place on June 4, 2024. Therefore, there is good cause to extend the discovery deadline as requested. As such, the parties request a 60-day extension of the discovery deadlines.

#### **D. PROPOSED EXTENDED DEADLINES**

The parties have agreed to extend the discovery deadlines in this case, as follows:

	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Motions to amend or add parties	Closed	Closed
Initial expert disclosures	Closed	Closed
Rebuttal expert disclosures	May 8, 2024	May 8, 2024
Close of Discovery	June 5, 2024	August 7, 2024
Dispositive motions	July 8, 2024	September 6, 2024
Pretrial Order	August 7, 2024	October 7, 2024, or, if dispositive motions are filed, 30 days after the entry of order on the dispositive motions.

Dated this 19<sup>th</sup> day of April, 2024.

H&P LAW

/s/ Marjorie Hauf  
 Marjorie Hauf, Esq.  
 Nevada Bar No. 8111  
 Cara Xidis, Esq.  
 Nevada Bar No. 11743  
 Attorneys for Plaintiff

Dated this 19<sup>th</sup> day of April, 2024.

KEATING LAW GROUP

/s/ John T. Keating  
 John T. Keating, Esq.  
 Nevada Bar No. 6373  
 Attorney for Defendant

**ORDER**

IT IS SO ORDERED.

DATED: 4/22/2024

  
 UNITED STATES MAGISTRATE JUDGE